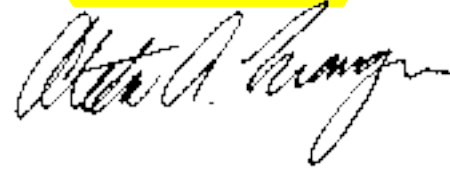


UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED for
extension to 11/3/14.

UNITED STATES OF AMERICA)
)
 v.)
)
 WILLIAM M. WORTHY II (2), et al)

No. 3:13-00119-2
JUDGE TRAUGER



MOTION TO EXTEND DEADLINE FOR FILING PRETRIAL MOTIONS
(JOINING MOTION FILED BY CO-DEFENDANT BACHMAN)

Undersigned counsel William J. Steed III, on behalf of Defendant (2), William M. Worthy II, respectfully moves this Honorable Court to extend the time within which to file pre-trial motions until November 3rd, 2014, or to another date selected by the Court. In so moving, undersigned counsel respectfully joins the Motion filed by co-defendant Richard Bachman, requesting the same relief on the same grounds (See Motion to Extend Time for Filing Pretrial Motions, Docket No. 84).

As set forth in the co-defendant's Motion, and in previous Motions to Continue trial, this case involves voluminous discovery, calculated at approximately a million pages. Additional time is necessary to file complex pre-trial motions after continuing review of the evidence. Indeed, the discovery process remains ongoing, with counsel receiving voluminous supplemental discovery from the Government as recently as August 5th, 2014, including many additional documents on a number of computer discs, that need to be reviewed, though there is no exact count as to the number of reports provided in that voluminous supplemental discovery response.

In sum, additional time is still needed to review discovery, including supplemental discovery. An extension of the motions deadline is clearly in the interests of justice.